REMARKS

By this amendment, claims 1-23 are pending, with claims 21-23 added, by way of the present amendment, without the introduction of new matter (see, e.g., Figs. 1 and 6 and the discussion in Applicants' disclosure thereof). Thus, 23 claims are pending, of which claims 1, 11 and 21 are independent.

The Office Action mailed December 5, 2001 rejected claims 1-20 under 35 U.S.C. § 103(a) as being unpatentable over *Von Hammerstein et al.* (US 6,292,495) in view of *White et al.* (US 6,069,890).

The rejection of claims 1-20 is respectfully traversed because *Von Hammerstein et al.* and *White et al.*, taken alone or in combination, fail to teach or suggest the limitations of the claims. For example, independent claim 1 recites "storing, in plural attachment devices, information respecting voice terminals accessible through the associated voice switch;" and independent claim 11 recites "means in plural attachment devices for storing information respecting voice terminals accessible through the associated voice switch."

By contrast, *Von Hammerstein et al.* discloses a system and method for communicating across a frame relay network (FRN) 12 link status information for permanent virtual circuits (PVCs) that share a data link connection identifier (DLCI). *Von Hammerstein et al.* addresses a problem with conventional frame relay networks (FRNs), wherein permanent virtual circuits (PVCs) used to carry voice frames are sub-multiplexed under a shared data link connection identifier (DLCI), but permanent virtual circuits (PVCs) used to carry bursty data packets typically are not (col. 5:9-10).

Von Hammerstein et al. addresses the above-noted problem by providing a system and method, wherein a first frame relay packet that includes link status information for a plurality of virtual circuits that each share a first data link connection identifier is received via a frame relay

network. A second frame relay packet that conforms to a standard local management interface status message format is generated using the link status information in the first frame relay packet and then transmitted to customer premise equipment. Col. 5:39-49. The link status information includes active connection, new connection, receiver not ready status, connection deletion and connection priority information (col. 7:38-41).

However, this link status information is not disclosed to include "information respecting voice terminals accessible through the associated voice switch," as required by independent claims 1 and 11. Furthermore, *Von Hammerstein et al.* does not teach or suggest **any** voice switches or voice terminals in Figs. 1-11 nor in the discussion thereof.

The portions of *Von Hammerstein et al.* cited in the present Office Action do not support the rejection. For example, Fig. 2 of *Von Hammerstein et al.*, although disclosing multiple frame relay attachment devices (FRADs) 14a, 14b and 14c, fails to teach or suggest "voice terminals accessible through the associated voice switch," much less "storing, in plural attachment devices, information respecting voice terminals accessible through the associated voice switch;" and "means in plural attachment devices for storing information respecting voice terminals accessible through the associated voice switch," as recited in independent claims 1 and 11.

White et al., directed to a system 120 for providing Internet telephone services, was not relied on for teaching this limitation and nonetheless fails to cure the deficiencies in *Von Hammerstein et al.* Accordingly, *Von Hammerstein et al.* and *White et al.*, taken alone or in combination, fail to teach or suggest the noted limitations recited in independent claims 1 and 11.

In addition, new claims 21-23 have been added and are patentably distinguishable over *Von Hammerstein et al.* and *White et al.*, taken alone or in combination, for substantially the same reasons as discussed with respect to independent claims 1 and 11. Specifically, *Von Hammerstein et al.* and *White et al.*, taken alone or in combination, fail to teach or suggest

a

"wherein each frame relay attachment device is configured to store an identification of all first voice terminals accessible, without incurring toll charges, to the respective private branch exchange of the frame relay attachment device, and each frame relay attachment device is configured to store an identification of all first voice terminals accessible, without incurring toll charges, to the other private branch exchanges of the other frame relay attachment devices," as recited in independent claim 21 and claims dependent therefrom.

Further, the specification was amended to correct a discovered informality. No new matter is introduced.

Therefore, the present application, as amended, overcomes the objections and rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 425-8501 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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2/28/02
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APPENDIX

Please amend the specification, as follows:

Page 9, last paragraph spanning to page 10:

--After the attachment device 301 is placed into service and allowed to interact with other attachment devices as will be described, its memory will contain additional information, i.e. that information in Fig. 3, shown at the right. This information is divided into two exemplary portions, each identified by a different PVC identification. For example, Fig. 3 shows a first PVC, i.e. PVC A, and a second PVC, i.e. PVC [C] B. Each portion of Fig. 3 also associates a .list of accessible telephone terminals. Under the heading PVC A, Fig. 3 shows two groups of telephone terminals, one including a particular NPA, in this case NPA1, as well as some but not all of telephone terminals with a different NPA, i.e. NPA2. In particular, telephone terminals in the range NPA2-XXX through NPA2-ZZZ are included. Fig. 3 also indicates that PVC [C] B is associated with a different complement of telephone terminals, some telephone terminals including an NPA3 prefix, and particularly NPA3-XXX through NPA3-ZZZ as well as all telephone terminals with an NPA4 prefix.--.